



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 22, 2023

By ECF

Hon. Richard M. Berman
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Avraham Eisenberg, 23 Cr. 10 (RMB)

Judge Berman:

At the June 14, 2023 pretrial conference, the Court asked the parties to submit a proposed schedule for certain pretrial motions and submissions in the above-captioned case.

The parties jointly propose the following schedule for suppression motions and motions to dismiss the indictment:

- July 28, 2023: Defense motions
- August 25, 2023: Government oppositions
- September 11, 2023: Defense replies

The parties also jointly propose the following schedule for other pretrial motions and submissions:

- November 8, 2023: Motions *in limine* and *Daubert* motions
- November 17, 2023: Oppositions to motions *in limine* and *Daubert* motions
- November 20, 2023: Joint voir dire and jury instructions (Government will send defense proposed jury instructions by November 1, 2023, and defense will send response to Government by November 13, 2023)
- Week of November 27, 2023: Final pretrial conference

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/ Thomas Burnett
Thomas Burnett
Assistant United States Attorney